

## Memorandum

**To:** Mr. David Thomas  
Pacific Gas and Electric Company (PG&E)

**From:** Molly Sandomire  
TRC Solutions

**Subject:** PG&E Fulton-Fitch Reconductoring Project  
SW3 at pole 62

**Date:** May 25, 2017

**CC:** Jo Lynn Lambert, PG&E Attorney

---

Dear Mr. Thomas;

This letter is regarding seasonal wetland SW3, which are included in the list of wetland features for PG&E's Fulton-Fitch Reconductoring Project. SW3 is delineated as a marginal seasonal wetland in the footprint of pull site 10 at pole 62.

Preliminary wetland and water mapping for the Fulton-Fitch Reconductoring Project was first conducted for planning purposes by Garcia and Associates (GANDA) in 2011-2012 (GANDA 2012). GANDA's preliminary assessment and mapping of wetland and water areas was based on field observations of potentially suitable wetland hydrology and hydrophytic vegetation, indicating the potential for hydric soils. This preliminary wetland and water mapping does not represent a formal jurisdictional delineation.

A formal jurisdictional wetland delineation was conducted for SW3 on November 2, 2012 by TRC biologists Julie Allison and Michael Farmer. Their survey was conducted during a period of drought. Seasonal wetland SW3 was characterized as a very shallow, linear depression within the existing access road for pole 62 and identified as a very marginal wetland given its very discrete boundaries and marginal wetland plant community comprised of perennial ryegrass, quaking grass (*Briza media*), and widely scattered rushes.

In March 2017, GANDA Vegetation Ecologist Andy Mieske visited the area to conduct a formal delineation of the jurisdictional limits for SW2. Mr. Mieske's survey was conducted two days after the area received 0.26 inches of rain. Mr. Mieske did not observe a predominance of hydrophytic vegetation or any evidence of wetland hydrology and hydric soils at this location. Based upon the absence of wetland criteria, the area was determined to be a non-wetland feature.

Because the feature identified as SW3 was conservatively delineated during a drought and GANDA's subsequent jurisdictional survey did not confirm its wetland status, TRC believes that

SW3 is not a seasonal wetland. TRC recommends that SW3 be removed from the list of potential wetland features.

If you have any further questions or concerns, please feel free to contact me at (650) 967-2365 or by email at [msandomire@trcsolutions.com](mailto:msandomire@trcsolutions.com).

Molly Sandomire  
Senior Environmental Planner  
TRC Solutions